

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., et al.,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that the undersigned counsel hereby enters their appearance for Orchard Yarn and Thread Company Inc. d/b/a Lion Brand Yarn Co. ("Lion Brand Yarn"), pursuant to section 1109(b) of the Bankruptcy Reform Act of 1978, as codified in title 11 of the United States Code, 11 U.S.C. §§ 101-1532, Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon Lion Brand Yarn through their undersigned counsel, as follows:

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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by Lion Brand Yarn does not, and shall not be deemed or construed to: (a) constitute a submission by Lion Brand Yarn to the jurisdiction of the Bankruptcy Court; or (b) constitute consent by Lion Brand Yarn to entry by the Bankruptcy Court of any final order or judgment, or any other order having the effect of a final order or judgment, in any non-core proceeding or with respect to any matter for which the Bankruptcy Court lacks jurisdiction and/or constitutional authority to enter a final order, **which consent is hereby withheld unless expressly granted in the future with respect to a specific issue, matter, or proceeding.**

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by Lion Brand Yarn does not, and shall not be deemed or construed to be a waiver or relinquishment of any substantive or procedural right, including but not limited to: (a) the right to challenge the constitutional authority of the Bankruptcy Court to enter a final order or judgment on, or any other order having the effect of a final order or judgment on, any matter; (b) the right to trial by jury in any proceedings so triable herein, in any associated adversary proceedings, in any litigation presently or hereafter pending in any other

court, or in any other case, controversy, or proceeding; (c) the right to seek withdrawal of the bankruptcy reference by a United States District Court in any matter subject to mandatory or discretionary withdrawal; and/or (d) any other rights, claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which Lion Brand Yarn is or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, arguments, counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers as to Lion Brand Yarn for which mailed or personal service is required under any applicable law, rule, regulation, or order.

Dated: January 17, 2025
Wilmington, Delaware

**LEWIS BRISBOIS BISGAARD & SMITH
LLP**

/s/ Scott D. Cousins

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